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September 3, 2020

**VIA ECF**

Hon. Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**MEMO ENDORSED**

**Re: Bernardo Martinez, et. al. v. Midspan Telecom Corp., et. al.**  
**Case No. 19-cv-10973 (VEC)(OTW)**

Dear Judge Caproni,

We represent Defendants Midspan Telecom Corp. and Richard Grullard in the above-referenced action.

We write this letter, jointly with counsel for Plaintiffs and counsel for Defendant Insperity PEO Services, L.P., to respectfully request that the deadline to file a motion for approval of the settlement be extended one (1) week from September 8, 2020 until September 15, 2020. This is the second request for an extension of this deadline. Since the initial request, substantial progress has been made on the preparation of the Settlement and Release Agreement, but the parties have not yet reached an agreement on all terms contained therein. As such, this extension is respectfully made to provide the parties with enough time to reach an agreement on the outstanding terms, and to finalize and sign the Settlement and Release Agreement.

We thank the Court for its consideration of the foregoing.

Respectfully yours,  
Kaufman Dolowich & Voluck, LLP

A handwritten signature in black ink, appearing to read "Matthew Cohen", written over a horizontal line.

By: \_\_\_\_\_  
Matthew Cohen

cc: All Counsel of Record (via ECF)

4845-8131-6554, v. 1

Application GRANTED.

The parties are hereby ORDERED to file a motion for approval of the settlement by **Tuesday, September 15, 2020**.

The September 18, 2020 conference is hereby adjourned to **Friday, September 25, 2020, at 2:30 P.M.**

All parties and any interested members of the public must attend by dialing 1-888-363-4749, using the access code 3121171 and the security code 0973. All attendees are advised to mute their phones when not speaking and to self-identify each time they speak.

SO ORDERED.



Date: 09/08/2020

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE